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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

Outgoing  
C0250005  
# 4101  
K

June 27, 2012

Kirk Nicholes, Resident Agent  
Alton Coal Development, LLC  
463 North 100 West, Suite 1  
Cedar City, Utah 84720

Subject: Drainage Control Adjustments, Task # 4101, Alton Coal Development, Coal Hollow Mine, (C/025/005

Dear Mr. Nicholes:

The Division has reviewed your application to make drainage control adjustments in your Alluvial Groundwater Management Plan.

The Division has determined that there are some remaining deficiencies that must be addressed before a determination can be made that the requirements of the R645 Coal Mining Rules have been met, and an approval can be granted. Those deficiencies are listed as an attachment to this letter.

Each deficiency identifies its author by that author's initials in parentheses, such that your staff can directly communicate with that individual should any questions arise relative to the preparation of Alton Coal Development's response to that particular deficiency.

The plans as submitted are denied. Please resubmit the entire application.

Sincerely

Daron R. Haddock  
Permit Supervisor

sqs  
Attachment  
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**Deficiency List**  
**Task No. 4101**  
**Drainage Control Adjustments**

The members of the review team include the following individuals:

Ken Hoffman (KH)  
Pete Hess (PH)  
James Owen (JO)

- **R645-301-526.115.2.** The applicant shall include a proceed for notification to the Division of the timeframe that they will be doing construction so the Division has the opportunity to observe the construction and installation. (KH)
  - **R645-301-526.220.** The applicant shall require prior specific Division approval for any groundwater dewatering wells installed outside of the area to be mined. The application shall be revised to indicate wells will only be installed in areas yet to be mined. Request for installation of well outside of the area to be mined shall be submitted to the Division as a separate application for approval. (KH)
  - **R645-301-542, R645-301-750,** the Permittee must develop and submit an approvable plan to the Division to monitor adjacent area alluvial ground water flows to within an acceptable distance (to be determined by the Division) from the coal recovery / reclamation area to determine if the ground water volumes are intercepting the back fill area; (PH)
  - **R645-301.724.100.** The applicant must provide ground water quantity descriptions with details of approximate rates of discharge and flow within the alluvium. These estimates should be based on a worst-case precipitation event using the thickest section of alluvium that can be treated by a trench conveyance system and based on a 100-year, 24-hour precipitation event. (KH)
- The applicant states "Chapter 7 text on page 7-16" addresses this deficiency. The text describes an observation of flow in the pits made on June 2, 2011 and that Table 7-9 includes flow rates in the alluvium. The applicant shall use the information since the start up of the mine of the flow into the pits and the information presented in MRP Table 7-9 to calculate a worst-case design flow rate in gallons per minute. The applicant shall use this design flow rate and document the calculations for the increase in size of Pond 3.
- **R645-301-731** The applicant shall demonstrate all required State Appropriated Water Rights are being address for groundwater dewatering and for any beneficial uses such as dust control for water collected from the groundwater dewatering wells. (KH)
  - **R645-301-731-221.** In addition, to #16 on page 6 of the application, the applicant shall revise the monitoring discussion in the MRP and associated tables to specify the locations and frequencies where selenium monitoring will be performed in accordance with Permit condition No. 4. (KH)

• **R645-301-731.720. and R645-301-526.220** The applicant shall include a map showing the area where groundwater dewatering wells are being requested to be installed. It is the Divisions expectation this will be the perimeter of the area to be mined. The applicant shall provide an updated copy of this map within 15 days of the construction of any groundwater dewatering wells. The map shall include a legend with details on constructions specifications in relation to the standard design. (KH)

• **R645-301-731-730.** Revise MRP Drawing 7-10 (Water Monitoring Locations) to show spring monitoring location SP-19. (KH)

• **R645-301-741,** the Permittee will address the following prior to receiving a recommendation for approval;

- 1) The French drain will need to be appropriately designed including length and width dimensions of the drain excavation;
- 2) Trench wall stability and the drain cross section design will be addressed.
  - a. How will the six inch pipe be coupled? On the surface? In the trench?
  - b. How will the workmen be protected?
  - c. Will trench walls be laid back on an angle?
  - d. Anticipated flow capacity in these ditches;
- 3) Explain what factors will be used to appropriately design the drain, (i.e., what size gravel is to be used?) Where are the collection trenches to be located? These locations need to be shown on a map. (PH)

• **R645-301-751.** The applicant must demonstrate that the effluent limitations for UPDES permit compliance prior to discharge. If the applicant is going to discharge at Outfall No. 005 the applicant shall at minimum collect and analyze a sample for UPDES effluent limitation parameters and receive these results prior to discharging. These result shall also be provided to the Division prior to discharging, however no Division approval for discharge will be required. As required by the UPDES permit testing will be required upon discharge at Outfall No. 005. (KH)

• **R645-301.533.712; .526.155.** Figure 1 of the application includes anticipated design details for the perforated pipe and culvert system (de-watering well). The Division requires that a more complete standard design for the system be provided. The standard design must include all pertinent data with anticipated dimensions of all aspects of the system, construction requirements, as well as all pertinent drawings, cross sections, etc. The applicant must remove all language from the application indicating the designs of the system may vary based on site-specific conditions. Any deviations from the standard design must be submitted to the Division as amendments to the MRP. (JO)

• **R645-301-800** The applicant must provide information on the maximum amount of interceptor drains that may be constructed in disturbed areas that are not intended to be mined. The applicant must update its bond calculation estimates to account for these facilities. The Division must consider these as support facilities and will need to verify that the permittee is adequately bonded for demolition of the structures. (JO) (PH)